1	THE HONORABLE J. KELLEY ARNOL			
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5	INITED CTATES DISTRICT COURT			
6	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA			
7	JAMES A. SIGGELKOW,) Cause No.: C04-5397JKA			
8	Plaintiff,) STIPULATION AND ORDER TO			
9) RESCHEDULE TRIAL DATE			
10	TRANSALTA CENTRALIA			
11	GENERATIONS, LLC,			
12	Defendant.			
COME NOW the parties in the above entitled action by and through their at				
	record, Richard H. Wooster of the law offices of Mann, Johnson, Wooster & McLaughlin, P.S counsel for Plaintiff, and Mark S. Filipini of Preston, Gates & Ellis, LLP, counsel for Defendant and hereby stipulate to and request the extension of the trial date, and the issuance of a revise			
Scheduling Order, for the following reasons:				
17	1. Plaintiff's counsel was involved in an age discrimination trial in the Feder			
18	District Court at Tacoma that extended over a three-week period in March ar			
19	April of 2005. The trial date was moved from February to March 21, 2			
20	accommodate review of a significant number of video depositions that needed to			
21	be reviewed and edited for presentation of the trial.			
22	2. Following the trial, significant hours were expended by Plaintiff's counsel of			
23	issues related to the tax implications of the verdict, motions for attorneys' fee			
24				
25	Page 1 Law Offices of			
	STIP & ORDER TO RESCHEDULE TRIAL DATE 820 A STREET, SUITE 550 TACOMA, WASHINGTON 98402 (253) 572-4161 Tacoma (253) 838-1154 Seattle			

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1		and responding to the Defenda	nts' motion for Judgment as a Matter of Law and	
2		request for a new trial.		
3	3.	As a result of that trial schedule	e, Plaintiff's counsel was unable to work on certain	
4		discovery issues related to this	case to the extent that counsel had expected.	
5	4.	A number of depositions need	to be taken by Plaintiff, at least one of which is in	
6		Boise, Idaho, and with the sun	nmer holiday schedule it will greatly accommodate	
7		scheduling the depositions if th	e discovery deadline is extended to at least August	
8		30, 2005 and dispositive motion	deadline extended to at least September 15, 2005.	
9	5.	In order to permit a full opport	unity to address anticipated dispositive motions and	
10		mediation opportunities, it is a	requested that the trial date be continued at least	
11		thirty days and all related plead	ling deadlines be adjusted accordingly, pursuant to	
12		a revised Scheduling Order issu	ed by the Court.	
13	All parties have been advised and consent to the extension as set forth above.			
14 15	MANN, JOHNSON, WOOSTER PRESTON, GATES & ELLIS, LLP & McLAUGHLIN, P.S.			
16	6 S/ Richard H. Wooster RICHARD H. WOOSTER, WSBA #13752		/s/ Mark S. Filipini per email approval Mark S. Filipini, WSBA #32501	
17	Attorney for Dated: 6/8/0		Attorney for Defendant Dated: 6/8/05	
18				
19	<u>ORDER</u>			
20	COMES NOW the above entitled Court upon the stipulation of the parties in the above			
21	action and being fully advised of the premises; it is hereby			
22	ORDERED, DECREED and ADJUDGED that the following deadlines shall be extended as			
23	follows:			
24	1. Th	ne trial date in this action is resc	heduled from November 14, 2005 to January 16 ,	
25	20	006.		
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1	2. The Court shall issue a revised Scheduling Order re-setting all other pertinent dates			
2	accordingly.			
3	DONE IN OPEN COURT this 10 th day of June, 2005.			
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6	/s/ J. Kelley Arnold			
7	THE HONORABLE J. KELLEY ARNOLD			
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